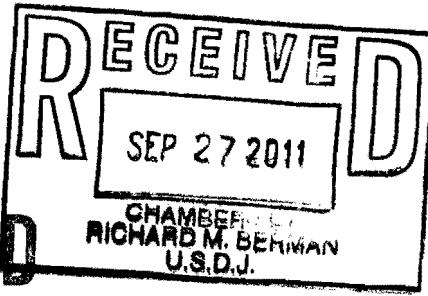




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MEMO ENDORSED



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VIA HAND DELIVERY

Honorable Richard M. Berman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

September 26, 2011

Due to the Court's trial calendar, a final pre-trial conference cannot be conducted prior to November. Accordingly, the trial scheduled to commence on 10/17/11 is vacated. The parties are directed to propose alternative dates for a conference in November.

SO ORDERED:
Date: 9/27/11

Richard M. Berman
Richard M. Berman, U.S.D.J.

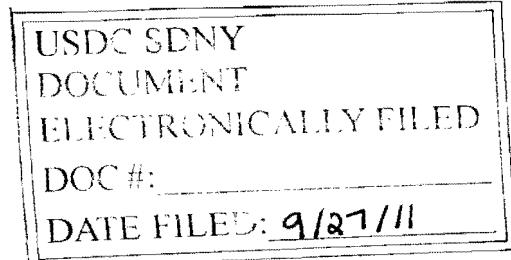
Re: G Investors Holding LLC as successors in interest to Stephen Carb as Trustee of Lollytogs, Inc. Trust v. Lincoln Benefit Life Company Inc.:
09-CV-2980 (RMB)(KNF)

Dear Judge Berman:

This firm represents defendant Lincoln Benefit Life Company Inc. ("Lincoln") in the above-captioned action. Pursuant to the instructions of your law clerk, Jessica, I am writing, with consent from my adversary, to request that the final pre-trial conference currently scheduled for September 29, 2011 be adjourned to either October 6 or October 12, 2011.

As we had earlier advised Jessica, September 29 is Rosh Hashanah and the earliest date that the parties, as well as their client representatives, are available to attend the final pre-trial conference is October 6. Further, as we noted in our previous letter to Your Honor dated September 22, 2011, Lincoln respectfully requests that the Court consider the cost and prejudice to Lincoln if the final pre-trial conference is adjourned to October 12, just days before a jury trial is scheduled to commence on October 17. Lincoln will be forced to incur substantial and unnecessary expenses preparing for a trial that may not occur because: (i) the case is settled at the final pre-trial conference; (ii) summary judgment is granted; or (iii) upon review of the motion papers, the Court may conclude that any issues that may require a trial are for the Court and not a jury.

Finally, I understand that oral argument on Lincoln's summary judgment motion will also be heard on the same day as the pre-trial conference.



ATLANTA BOSTON CHICAGO HOUSTON NEW YORK LOS ANGELES SACRAMENTO SAN FRANCISCO NEW YORK WASHINGTON D.C. BRUSSELS



Honorable Richard M. Berman
September 26, 2011
Page 2

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

A handwritten signature in black ink that reads "Jay W. Cho".

Jay W. Cho

cc: Dennis D'Antonio, Esq. (by email)
D. Christopher Mason, Esq. (by email)